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ABSTRACT

As required by law, state education agencies receiving funds under the Stewart B. McKinney Homeless Assistance Act submitted reports on the number and location of homeless children and youth in their states to the U.S. Department of Education. These reports also include data on the nature and extent of problems of access to education and student placement in elementary and secondary schools. Sixteen states submitted data from calendar year 1990, 12 states submitted data collected at least partly during 1990, and the balance submitted data in 1991. The major difficulty states faced in attempting to establish yearly counts was the risk of double-counting since children may be housed in more than one shelter in a given year. This report: (1) presents the total numbers of homeless children and youth by state (the 50 states, the District of Columbia, and outlying U.S. territories), and by grade level, type of housing, and school attendance; (2) summarizes the methodologies used to collect the data; and (3) summarizes data on special needs students. Excluding preschool children, states reported 327,416 homeless school-age children and youths (48.6 percent were elementary school students, 21.2 percent were junior high school students, 24.4 percent were high school students, and 5.8 percent were of unspecified grade levels). Four tables contain the data. Attachments include guidelines about the definition of homeless and a discussion of methodology, with questions and answers on counting procedures, and an outline of significant aspects of Title VII-B of the McKinney Act. (SLD)

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# REPORT TO CONGRESS

# FINAL REPORTS SUBMITTED BY STATES AUTHORIZED BY

# EDUCATION FOR HOMELESS CHILDREN AND YOUTH PROGRAM FISCAL YEAR 1991

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This report is submitted in response to the requirement in Section 724(d)(3) of the Stewart B. McKinney Homeless Assistance Act (Public Law 100-77, July 22, 1987, amended November 29, 1990)

*U.S. Department of Education*
*Office of Elementary and Secondary Education*

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UNITED STATES DEPARTMENT OF EDUCATION

THE SECRETARY

SEP - 3 1992

Honorable Edward M. Kennedy
Chairman, Committee on Labor and
Human Resources
United States Senate
Washington, DC 20510

Dear Mr. Chairman:

In accordance with Section 722(d)(3) of the Stewart B. McKinney Homeless Assistance Act, the State educational agencies were instructed to submit to the Department by December 31, 1991, final reports on the number and location of homeless children and youth in their States. The reports also included data on the nature and extent of problems of access to, and placement of, homeless children and homeless youth in elementary and secondary schools, the difficulties in identifying the special needs of such children, and any progress made by the State educational agency and local educational agencies within the State in addressing such problems and difficulties. In accordance with Section 724(b)(5) of the Act, enclosed is our report based on that data (Enclosure A).

Because of the problems inherent in accurately counting the number of homeless children and youth, differences among the States in defining homelessness, and differing methodologies among the States to adjust for possible duplicate counts, we continue to advise that data contained in this report be viewed with considerable caution. The data present estimates rather than precise numbers.

It should be noted that while the estimate of the total number of homeless children and youth nationwide has not increased significantly from 1989 to 1991, the variation in individual States is often high. A comparison of the total counts alone masks this large variability within States and makes the data appear more accurate than they probably are.

It should also be noted that while many States submitted data collected in 1991, others submitted data collected in 1990. At the time of the November 1990 reauthorization of the McKinney Act, some States had already started their 1990 counts to fulfill the annual reporting requirement. The 1990 Amendments to the Act changed the reporting requirement to every two years, with the first report to the Department due December 31, 1991. In a May 6, 1991, memorandum to the States (Enclosure B), the Department advised States that counts completed during calendar year 1990 could be used to fulfill the 1991 reporting



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requirement. The Department directed States to indicate the calendar year during which the data were collected. A total of 16 States submitted data collected during calendar year 1990, and 12 States collected at least part of their data during 1990. Reports based on data from 1990 may not accurately reflect the numbers of homeless children and youth present in these States during calendar year 1991.

In spite of our efforts during the past two years to improve the quality of the data on homeless children, States have continued to encounter extraordinary difficulties in data collection. In response to these difficulties, the Department issued guidance on counting homeless children to the States on August 18, 1989, to be used in conducting their counts for 1991 (Enclosure C). Because it is impossible to assess the success of each State in overcoming obstacles to the collection of accurate and comparable data on homeless individuals, we believe that any analyses based on these data should acknowledge this problem and thereby minimize the likelihood of erroneous conclusions.

We are aware of the need to forward the data to you at this time, but plan to explore appropriate means of ensuring that more reliable information is gathered in the future. For example, the Department of Education has entered into a joint agreement with other Federal agencies administering McKinney Act programs to fund a broad study on the nature and problems of homeless individuals. The Census Bureau will design a Federal survey on homeless persons that will estimate the total national homeless population. Questions specifically addressing children's needs and services will be included in the survey. The Statement of Work for the Census Bureau's survey is enclosed for your information (Enclosure D). As part of an interagency agreement with the Department of Housing and Urban Development, the Department of Education has contributed $20,000 for the development of the survey and $40,000 for the pilot test. Provided funds are available, the Census Bureau plans to conduct the pretest in 1993 and the survey in 1994.

We have enclosed for your information the Status Reports submitted by the States (Enclosure E).

If you have any questions on the information contained in this report, please contact Dr. John T. MacDonald, Assistant Secretary for Elementary and Secondary Education, at 401-0113.

Sincerely,

Lamar Alexander

Lamar Alexander

Enclosures

ENCLOSURE A

REPORT TO CONGRESS

AGENCY: U.S. Department of Education

PROGRAM: Education for Homeless Children and Youth

STATUTE: Stewart B. McKinney Homeless Assistance Act, Title VII-B (Public Law 100-77, July 22, 1987, amended November 29, 1990)

SUBJECT: A compilation of the final reports submitted by States in accordance with section 724 of the Stewart B. McKinney Homeless Assistance Act.

INTRODUCTION

In accordance with section 722(d)(3) of the Act, State educational agencies (SEAs) were instructed to submit to the Department by December 31, 1991, final reports concerning the data collected on the number and location of homeless children and youths in the States. This report summarizes data reported by States and other jurisdictions (hereafter referred to as States). Although States were not required to report in 1990, many States conducted counts in 1990 prior to the statutory changes resulting from the November 1990 reauthorization of the McKinney Act. We advised States that data collected in 1990 could be used to satisfy the reporting requirements for 1991, but we cautioned these States to make adjustments in the data to account for changes in their homeless populations between 1990 and 1991.

State educational agencies in 50 States, the District of Columbia, the Commonwealth of Puerto Rico, the Virgin Islands, American Samoa, and the Commonwealth of the Northern Mariana Islands received fiscal year 1991 funds under this program. All SEAs receiving funds submitted reports.

In our 1989 report we stated that because of several problems in gathering data on homeless children, that data should be viewed with caution. Because the States faced similar problems in gathering their data for 1991, we would advise you to view the data in this report with considerable caution as well.

The major difficulty States incur in attempting to establish yearly counts is the risk of double-counting, since shelter providers are often sources of information on homeless children, and children often are housed in more than one shelter during the year. As an alternative, some States do a partial count using two different methods to estimate the number of children homeless at any given time during the year. In the first method, States gather data from a sample of locations or shelters. Then they extrapolate to a total for the State. In the second method,

States do a one-day count throughout the State. They extrapolate the number into an estimate of the total number who are homeless at any time during the school year. In these two alternatives, the accuracy of the total number is dependent upon the accuracy of the unextrapolated count and the precision of the conversion of the count to a year-long estimate.

In our guidance, we asked States to make adjustments, to the extent possible, for duplication, but they have not always been able to do so. In addition, some segments of the homeless populations, such as those temporarily in doubled-up housing (i.e., children who live with relatives or friends to avoid homelessness), are extraordinarily difficult to identify. Not all States included this category in their counts.

Therefore, in spite of efforts by the Department and the States, the problems associated with duplication, extrapolation, and differing State definitions of homeless continue. We continue to advise that data contained in this report be viewed cautiously, and as estimates rather than as precise numbers.

To assist in the interpretation of these data, we have included more specific information for States where there are large differences in counts between 1989 and 1991.

SUMMARY OF DATA INCLUDED IN SEA REPORTS

This portion of the report:

(1) Presents the total numbers of homeless children and youth as reported by States by grade level, type of housing (if any), and school attendance.

(2) Summarizes the methodologies used by States to collect these data, explains discrepancies in the totals among different analyses, and demonstrates the range of approaches used by the States to count homeless children and youth.

(3) Summarizes data from States on the special service needs of homeless children and youth and the reasons homeless children do not attend school on a regular basis.

Grade Levels of Homeless Children and Youth

Table 1 shows the grade levels of all reported homeless children and youth in each State. Excluding preschool children, States reported a total of 327,416[1] homeless school-age children and youth, of whom:

- 48.6 percent were elementary students,
- 21.2 percent were junior high school students,
- 24.4 percent were high school students, and
- 5.8 percent were of unspecified grade level.

Sixteen States included optional counts of homeless preschool children. Their total number was 75,851 children or 51 percent of the total number of homeless children and youth (PreK-12) in those States.

Types of Housing of Homeless Children and Youth

Table 2 shows the housing arrangements of homeless children and youth in each State.

- One State (Missouri) did not provide data on the housing of its homeless children and youth. One State (Delaware) did not annualize the data reported under this section. Several States provided only partial data (e.g., they did not count the number of children living in doubled-up housing). In addition, some States gathered their data for Table 1 from different sources than their data for Table 2 (e.g., data for Table 1 were collected from schools while data for Table 2 were collected from shelter providers or from social service agencies). This accounts for discrepancies between Tables 1 and 2.

- States that provided complete data reported that homeless children and youth resided in the following settings:

  -- 17.5 percent were in publicly funded homeless shelters,
  -- 45.8 percent were in privately funded homeless shelters,

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[1] This total, like all others in the report, was summed from the data submitted by the States. Since methodologies used by States differ, the figure is a broad estimate only.

-- 21.8 percent were temporarily living with family or friends, and
-- 14.9 percent were living in other locations including: welfare hotels, runaway shelters, battered women shelters, campgrounds, parks, and abandoned buildings.

School Attendance of Homeless Children and Youth

Table 3 shows that 20 percent of children and youth were not attending school during their homelessness.

- One State (New York) was not able to provide any data on the attendance or non-attendance of its homeless children and youth.

Methodologies Used by States in Collecting Data

Table 4 summarizes the methodologies used by each State in compiling its data on the number of homeless children and youth. Comments on the States are provided to illustrate the diversity in methodology. These varied methodologies lead us to view the data in this report with caution.

- States collected data using varied time frames. Specifically:

  -- Ten States gave results of one-day counts.
  -- Twenty-seven States gave year-long data.
  -- Three States used a one-month count.
  -- Two States used a mixture of day- and year-long data.
  -- Two States used a mixture of month- and year-long data.
  -- Two States used a one-week count.
  -- One State gave results of a two-day count.
  -- One State used a two-week count.
  -- One State used a two-month count.
  -- One State used a four-month count.
  -- One State used six-month count.
  -- Four States gave results of data collected during the school year.

## Reasons Homeless Children and Youth Are Not Attending School

The States' responses for why homeless children did not attend school are listed below:

| | Number of States Putting in Top 5 |
|---|---|
| Lack of transportation to/from temporary residence | 28 |
| Shelter stays are too short to make enrollment worthwhile | 24 |
| Youth are discouraged by frequent school changes and by condition of homelessness | 18 |
| Families lack motivation/keep children out of school | 17 |
| Lack of school records--academic, health, and immunization | 16 |
| Parents preoccupied with finding food, shelter, and employment | 14 |
| Lack of resources for supplies and clothing | 14 |
| Behavior problems or drug use by youth | 13 |
| Lack of health and mental health care/illness | 9 |
| State guardianship/residency requirements not uniformly interpreted by schools | 9 |
| Lack of information on school requirements/location | 7 |
| Delays in transferring records | 6 |
| Concern that abusive parent will locate and harm child | 4 |
| Lack of day care for young siblings/teen parents | 4 |
| Lack of specialized instructional services, including alternative schools | 4 |
| Children working | 2 |
| Insufficient coordination between schools and service providers | 2 |
| Parents' concern that children will be taken away by school or service providers | 2 |

Special Needs of Homeless Children and Youth

The States' responses on special educational needs of homeless children and youth are listed below:

| | Number of States Putting in Top 5 |
|---|---|
| Remediation/tutoring in basic skills | 33 |
| School materials and clothes for school | 25 |
| Support services such as counselors and social workers | 24 |
| After-school/extended day/summer programs to provide basic needs (food, shelter) and recreation | 23 |
| Adequate transportation | 21 |
| Educational assessment, screening, placement, and tracking | 20 |
| Educational program continuity and stability | 17 |
| Extensive long-term counseling to deal with problems associated with homelessness | 17 |
| Access to health care and nutritional services | 16 |
| Sensitivity and awareness training for school personnel/students | 14 |
| Special education/expedited evaluation for special education services | 11 |
| Permanent or long-term transitional housing | 9 |
| Increased coordination between schools and community agencies | 8 |
| Parenting skills training, especially for teen parents | 7 |
| Dropout prevention programs | 7 |
| A private place to study and do homework | 6 |
| Self-esteem development | 6 |
| Greater parental involvement | 6 |
| Alternative schools for the homeless | 5 |
| Preschool enrichment | 4 |
| Bilingual education | 4 |
| Access to vocational education | 3 |
| Drug/alcohol treatment | 1 |
| Early identification and enrollment of kindergarten students | 1 |

TABLE 1
GRADE LEVELS OF REPORTED HOMELESS CHILDREN AND YOUTH

| State | Pre-K | Elem. | Junior High School | High School | Not Specified | Total (K-12) |
|---|---|---|---|---|---|---|
| Alabama | 8,884 | 6,893 | 4,997 | 4,770 | 4,546 | 21,206 |
| Alaska | | 410 | 172 | 859 | | 1,441 |
| Amer. Samoa | | 11 | 34 | 35 | | 80 |
| Arizona | | 4,367 | 1,483 | 1,634 | | 7,484 |
| Arkansas | | 2,409 | 1,446 | 1,449 | | 5,304 |
| California | | 14,496 | 5,946 | 9,758 | | 30,200 |
| Colorado | | 579 | 321 | 2,314 | | 3,214 |
| Connecticut | | 1,769 | 1,537 | 1,450 | | 4,756 |
| Delaware | | 420 | 132 | 132 | | 684 |
| District of Columbia | | 420 | 76 | 50 | | 546 |
| Florida | 1,944 | 8,924 | 2,296 | 1,464 | | 12,684 |
| Georgia | 4,951 | 5,020[1] | | 3,464 | | 8,484 |
| Hawaii | | 299 | 97 | 57 | | 453 |
| Idaho | 1,188 | 1,101 | 943 | 472 | 978[2] | 3,494 |
| Illinois | | 2,529 | 2,523 | 4,186 | | 9,238 |
| Indiana | | 5,489 | 1,681 | 1,696 | | 8,866 |
| Iowa | 945 | 574 | 317 | 291 | | 1,182 |
| Kansas | | 3,151 | 2,064 | 2,516 | | 7,731 |
| Kentucky | | 2,634 | 1,142 | 1,189 | | 4,965 |
| Louisiana | | 2,579 | 2,357 | 1,035 | | 5,971 |
| Maine | | 640 | 840 | 3,344 | | 4,824 |
| Maryland | | 3,076 | 521 | 432 | | 4,029 |
| Mass. | 6,481 | 3,559 | 1,652 | 1,017 | | 6,228 |
| Michigan | | 3,813 | 1,467 | 2,053 | | 7,333 |
| Minnesota | 3,008 | 6,534 | 2,927 | 2,416 | | 11,877 |

[1] Georgia reported the numbers of homeless children and youth according to grade levels K-7 and 8-12.

[2] This figure represents homeless individuals in Idaho, ages 19-21, who are identified as "eligible for, but not completed high school."

Table 1

| State | Pre-K | Elem. | Junior High School | High School | Not Specified | Total (K-12) |
|---|---|---|---|---|---|---|
| Miss. | | 1,049 | 278 | 112 | 87 | 1,526 |
| Missouri | 387 | 343 | 98 | 46 | | 487 |
| Montana | | 549 | 408 | 966 | | 1,923 |
| Nebraska | | 195 | 11 | 54 | 84 | 344 |
| Nevada | | 754 | 309[3] | | 214[4] | 1,277 |
| New Hampshire | | 80 | 15 | 123 | 332 | 550 |
| New Jersey | 9,449 | 11,088 | 4,465 | 4,525 | | 20,078 |
| New Mexico | | 572 | 461 | 972 | | 2,005 |
| New York | | 1,824[5] | 456 | 335 | 9,703[6] | 12,318 |
| N. Carolina | | 2,558 | 1,534 | 1,592 | | 5,684 |
| N. Dakota | 124 | 229 | 75 | 103 | | 407 |
| Ohio | | 8,446 | 2,643 | 3,366 | 3,338 | 17,793 |
| Oklahoma | | 1,151 | 520 | 319 | | 1,990 |
| Oregon | 3,792 | 2,328 | 1,116 | 2,940 | | 6,384 |
| Penn. | 10,527 | 8,353 | 2,592 | 2,484 | | 13,429 |

[3] Nevada reported a combined middle/high school figure and did not provide a breakout of homeless children in grades 7-9 and 10-12.

[4] This figure represents "suspected cases of homeless children and youth: 194 in grades K-6 and 20 in middle/high school grades 7-12.

[5] New York's report of homeless children and youth according to school-level groups K-12 is limited to those children and youth residing in New York City only. Figures for the rest of the State are incorporated in the "Not Specified" category.

[6] This figure includes 1599 students in the "Rest of State" (i.e., outside New York City), 7473 homeless children and youth residing in shelters and hotels throughout the State, and 593 runaway and homeless youth in transitional residential programs (271 in New York City and 322 throughout the rest of the State). The Department of Social Services provided data for these groups of homeless children and youth, but, because of the nature of their data collection procedures, they were unable to provide breakdowns by grade levels. This figure also includes 38 "Special Education" students in New York City identified by the New York City Board of Education.

Table 1

| State | Pre-K | Elem. | Junior High School | High School | Not Specified | Total (K-12) |
|---|---|---|---|---|---|---|
| Puerto Rico | | 1,680 | 492 | 144 | | 2,316 |
| Rhode Island | | 324 | 71 | 59 | 98 | 552 |
| S. Carolina | 1,712 | 1,417 | 849 | 462 | | 2,728 |
| S. Dakota | 92 | 1,059 | 728 | 596 | | 2,383 |
| Tennessee | | 634 | 379 | 267 | 123 | 1,403 |
| Texas | 5,265 | 10,954 | 5,563 | 4,425 | | 20,942 |
| Utah | | 3,337 | 649 | 649 | | 4,635 |
| Vermont | | 332 | 65 | 179 | | 576 |
| Virgin Islands | | 41 | | 1 | | 42 |
| Virginia | | 935 | 194 | 240 | 181 | 1,550 |
| Washington | 17,102 | 9,968 | 3,865 | 3,868 | | 17,701 |
| W. Virginia | | 1,138 | 438 | 375 | | 1,951 |
| Wisconsin | | 4,969 | 3,097 | 2,249 | | 10,315 |
| Wyoming | | 661 | 882 | 310 | | 1,853 |
| | | | | | | |
| Totals | 75,851 | 158,664 | 69,224 | 79,844 | 19,684 | 327,416 |

TABLE 2

| TYPE OF HOUSING OF HOMELESS CHILDREN AND YOUTH | | | | | |
|---|---|---|---|---|---|
| | PUBLIC SHELTER | PRIVATE SHELTER | RELATIVES OR FRIENDS | OTHER (1) | TOTAL (2) |
| ALABAMA | 16,501 | 14,835 | NA | NA | 31,336* |
| ALASKA | 260 | 664 | 360 | 778 | 2,062 |
| Amer. Samoa | 18 | 0 | 45 | NA | 63 |
| ARIZONA | 630 | 4,802 | 4,269 | 1,202 | 10,903 |
| ARKANSAS | 150 | 1,724 | 2,891 | 589 | 5,354 |
| CALIFORNIA | 2,118 | 3,926 | 12,680 | 11,476 | 30,200 |
| COLORADO | 0 | 2,410 | 354 | 450 | 3,214 |
| CONNECTICUT | 343 | 4,413 | NA | NA | 4,756 |
| DELAWARE | 63 | NA | NA | NA | 63 |
| D.C. | 282 | 281 | NA | NA | 563 |
| FLORIDA | 7,232 | 276 | 5,136 | 1,784 | 14,428 |
| GEORGIA | NA | 13,435 | NA | NA | 13,435 |
| HAWAII | 0 | 492 | NA | 319 | 811 |
| IDAHO | 1,076 | 942 | 1,580 | 1,784 | 5,382 |
| ILLINOIS | 783 | 1,124 | 5,408 | 1,923 | 9,238 |
| INDIANA | 219 | 195 | 6,575 | NA | 6,989 |
| IOWA | 183 | 0 | 1,755 | 189 | 2,127 |
| KANSAS | 1,185 | 321 | 5,556 | 669 | 7,731 |
| KENTUCKY | 597 | 0 | 3,391 | 969 | 4,957 |
| LOUISIANA | NA | 5,971 | NA | NA | 5,971 |
| MAINE | 255 | 2,314 | 954 | 1,301 | 4,824 |
| MARYLAND | 680 | 3,985 | 197 | 71 | 4,933 |
| MASSACHUSETTS | 5,286 | 0 | 6,825 | 598 | 12,709 |

Table 2

| TYPE OF HOUSING OF HOMELESS CHILDREN AND YOUTH | | | | | |
|---|---|---|---|---|---|
| | PUBLIC SHELTER | PRIVATE SHELTER | RELATIVES OR FRIENDS | OTHER (1) | TOTAL (2) |
| MICHIGAN | 660 | 5,426 | 220 | 1,027 | 7,333 |
| MINNESOTA | 0 | 12,130 | NA | 2,755 | 14,885 |
| MISSISSIPPI | 120 | 368 | 859 | 25 | 1,372 |
| MISSOURI | NA | NA | NA | NA | NA |
| MONTANA | 0 | 626 | 675 | 622 | 1,923 |
| NEBRASKA | 44 | 203 | 30 | 81 | 358 |
| NEVADA | 275 | 1,190 | 305 | 131 | 1,901 |
| NEW HAMPSHIRE | 0 | 9 | 138 | 71 | 218 |
| NEW JERSEY | 2,807 | 3,636 | 2,277 | 10,132 | 18,852 |
| NEW MEXICO | 112 | 192 | 1,171 | 324 | 1,799 |
| NEW YORK | 663 | 6,440 | NA | 1,537 | 8,640 |
| NORTH CAROLINA | 2,444 | 2,798 | 323 | 119 | 5,684 |
| NORTH DAKOTA | 0 | 46 | 132 | 41 | 219 |
| OHIO | 861 | 15,001 | 1,902 | 29 | 17,793 |
| OKLAHOMA | NA | 5,950 | NA | | 5,950 |
| OREGON | 826 | 5,784 | 2,140 | 1,426 | 10,176 |
| PENNSYLVANIA | NA | 11,486 | NA | 1,943 | 13,429 |
| PUERTO RICO | 82 | 342 | 400 | 1,492 | 2,316 |
| RHODE ISLAND | 49 | 250 | 135 | 118 | 552 |
| SOUTH CAROLINA | 226 | 1,840 | 1,685 | 915 | 4,666 |
| SOUTH DAKOTA | 695 | 1,192 | 1,159 | 264 | 3,310 |
| TENNESSEE | 452 | 484 | 286 | 58 | 1,280 |
| TEXAS | 1,064 | 19,878 | 0 | 0 | 20,942 |
| UTAH | 3,880 | 755 | NA | NA | 4,635 |

Table 2

| TYPE OF HOUSING OF HOMELESS CHILDREN AND YOUTH | | | | | |
|---|---|---|---|---|---|
| | PUBLIC SHELTER | PRIVATE SHELTER | RELATIVES OR FRIENDS | OTHER (1) | TOTAL (2) |
| VERMONT | 0 | 144 | 288 | 144 | 576 |
| VIRGIN ISLANDS | 0 | 12 | 30 | 0 | 42 |
| VIRGINIA | 679 | 305 | 193 | 173 | 1,350 |
| WASHINGTON | 7,017 | 780 | 4,937 | 4,967 | 17,701 |
| WEST VIRGINIA | 308 | 0 | 1,643 | 0 | 1,951 |
| WISCONSIN | 2,476 | 7,324 | NA | 515 | 10,315 |
| WYOMING | 82 | 45 | 215 | 1,511 | 1,853 |
| NO. MARIANAS | 0 | 41 | 321 | 10 | 372 |
| | | | | | |
| TOTAL | 63,683 | 166,787 | 79,440 | 54,532 | 364,442 |

TABLE 3

| SCHOOL ATTENDANCE OF HOMELESS CHILDREN AND YOUTH | | | |
|---|---|---|---|
| | Attending | Not Attending | Total |
| ALABAMA | 16,660 | 0 | 16,660 |
| ALASKA | 692 | 749 | 1,441 |
| AMERICA SAMOA | 80 | 0 | 80 |
| ARIZONA | 5,072 | 2,582 | 7,654 |
| ARKANSAS | 4,529 | 825 | 5,354 |
| CALIFORNIA | 18,120 | 12,080 | 30,200 |
| COLORADO | 771 | 2,443 | 3,214 |
| CONNECTICUT | 167 | 0 | 167 |
| DELAWARE | 57 | 0 | 57 |
| DISTRICT OF COLUMBIA | 546 | 5 | 546 |
| FLORIDA | 11,452 | 3,176 | 14,628 |
| GEORGIA | 7,780 | 704 | 8,484 |
| HAWAII | 295 | 158 | 453 |
| IDAHO | 2,310 | 206 | 2,516 |
| ILLINOIS | 7,945 | 1,293 | 9,238 |
| INDIANA | 8,768 | 98 | 8,866 |
| IOWA | 921 | 261 | 1,182 |
| KANSAS | 7,404 | 327 | 7,731 |
| KENTUCKY | 4,853 | 112 | 4,965 |
| LOUISIANA | 5,971 | 0 | 5,971 |
| MAINE | 1,800 | 3,024 | 4,824 |
| MARYLAND | 3,185 | 844 | 4,029 |
| MASSACHUSETTS | 5,736 | 492 | 6,228 |
| MICHIGAN | 5,060 | 2,273 | 7,333 |
| MINNESOTA | 9,885 | 5,000 | 14,885 |
| MISSISSIPPI | 1,453 | 73 | 1,526 |
| MISSOURI | 461 | 26 | 487 |
| MONTANA | 1,756 | 167 | 1,923 |

Table 3

| SCHOOL ATTENDANCE OF HOMELESS CHILDREN AND YOUTH | | | |
|---|---|---|---|
| | Attending | Not Attending | Total |
| NEBRASKA | 279 | 64 | 343 |
| NEVADA | 1,182 | 95 | 1,277 |
| NEW HAMPSHIRE | 210 | 340 | 550 |
| NEW JERSEY | 18,852 | 10,675 | 29,527 |
| NEW MEXICO | 1,976 | 29 | 2,005 |
| NEW YORK | N/A | N/A | N/A |
| NORTH CAROLINA | 5,098 | 586 | 5,684 |
| NORTH DAKOTA | 354 | 53 | 407 |
| NORTHERN MARIANA | 347 | 25 | 372 |
| OHIO | 16,862 | 931 | 17,793 |
| OKLAHOMA | 678 | 109 | 787 |
| OREGON | 7,836 | 2,340 | 10,176 |
| PENNSYLVANIA | 11,574 | 1,855 | 13,429 |
| PUERTO RICO | 2,316 | 0 | 2,316 |
| RHODE ISLAND | 442 | 110 | 552 |
| SOUTH CAROLINA | 2,600 | 118 | 2,718 |
| SOUTH DAKOTA | 2,449 | 861 | 3,310 |
| TENNESSEE | 1,280 | 123 | 1,403 |
| TEXAS | 19,497 | 1,445 | 20,942 |
| UTAH | 2,503 | 2,132 | 4,635 |
| VERMONT | 427 | 149 | 576 |
| VIRGIN ISLANDS | 42 | 0 | 42 |
| VIRGINIA | 1,369 | 181 | 1,550 |
| WASHINGTON | 12,947 | 4,754 | 17,701 |
| WEST VIRGINIA | 1,946 | 5 | 1,951 |
| WISCONSIN | 9,909 | 406 | 10,315 |
| WYOMING | 1,761 | 92 | 1,853 |
| TOTAL | 258,465 | 64,396 | 322,856 |

TABLE 4

METHODS USED BY STATES TO COLLECT DATA

| | Time Frame | Comments |
|---|---|---|
| Alabama | Six Month | Study conducted by University of Alabama, "Services for Homeless Children and Their Families," Volume I, October 1990. |
| Alaska | One Month | Survey of school districts by mail; phone follow up. |
| American Samoa | Year | Data provided by Department of Education, Office of Social Services, Crisis Line, Emergency Assistance, and shelter programs. |
| Arizona | Year | Statewide survey of school districts, social service agencies, health agencies, and law enforcement agencies. |
| Arkansas | Day and Year | Estimated an annual count using the ratio of nightly homeless youth to annual prevalence. |
| California | Year | Survey conducted by State Department of Education in 1990 and updated during 1991. |
| Colorado | Year | Extrapolation from 1990 University of Colorado study of homelessness. |
| Connecticut | Day and Year | Temporary Shelter Report from Department of Children and Youth Services; Homeless shelter demographics from Department of Human Resources; One-day phone survey of all emergency, youth, and domestic violence shelters in State. |
| Delaware | Day | Estimated an annual count using data obtained from one-day count of public shelters. |
| District of Columbia | Month and Year | Data based on counts conducted each month during calendar year 1991 by SEA. Student database to track and monitor school-age homeless children maintained by SEA. |
| Florida | Day | Yearly projection based on one-day statewide survey of shelters and schools, cleared of duplicate cases. |
| Georgia | Year | Yearly projection for 1991 based on 1990 survey of shelter providers and LEAs. |
| Hawaii | Day | One-day statewide count of public schools. |

Table 4

| | | |
|---|---|---|
| Idaho | Year | 12 month sampling of social service agency records statewide. |
| Illinois | Day | One-day count, annualized. |
| Indiana | Month | Random sample survey of public schools and shelters. |
| Iowa | Year | Data from "Homelessness in Iowa: The 1990 Report," February 1991. |
| Kansas | Day | One-day count of school districts and homeless shelters |
| Kentucky | Month | Yearly projection based on one-month count conducted in schools and shelters. |
| Louisiana | Year | "Statewide Homeless Needs Assessment Survey of Shelter Providers," jointly developed by SEA and Interagency Action Council on the Homeless. |
| Maine | Year | Unduplicated counts from shelters for homeless youth, for homeless families with children, and domestic violence centers. |
| Maryland | School Year | State tracking system for homeless students; survey of family shelters and local departments of social services. |
| Massachusetts | Day | Yearly projection based on one-day survey of shelters and statistics from State Department of Public Welfare. |
| Michigan | Year | Yearly projection based on statistics from 1990 Comprehensive Housing Affordability Strategy for State of Michigan; 1990 report published by Detroit Urban League, and phone surveys of homeless shelters. |
| Minnesota | School Year | Data from Department of Jobs and Training Surveys, 1990 and 1991; Twin City Survey of Emergency Shelter Residents, 1990; St. Paul Overnight Shelter Board's Report to the Mayor and City Council, 1990; Carondelet Health Needs Assessment, 1989; interviews of school personnel and shelter staff. |
| Mississippi | School Year | Data from surveys received from school districts, shelters, community action agencies, school attendance officers, and Rankin County Department of Human Services. |

Table 4

| | | |
|---|---|---|
| Missouri | Day | Yearly projection based on data collected during one-day statewide count of all known emergency shelters, transitional programs for the homeless, Human Development Corporation and Community Action Agency offices that provided organized housing services for the homeless, domestic violence shelters, and residential treatment facilities. |
| Montana | Year | Montana Homeless Survey: Homeless Children and Youth Count and Needs Assessment. |
| Nebraska | Week | Data collected from county superintendents of schools, school district superintendents, State Department of Social Services, and the nine Community Action Agencies. |
| Nevada | Fall 1991 | Probability survey of school advocates in 33% of Nevada's public schools. Each advocate was asked to report the numbers of children who were definitely homeless and those who were suspected of being homeless. |
| New Hampshire | Day | Mail survey to school districts for a one-day count; 89% response rate. |
| New Jersey | Year | Yearly projection based on data from SEA survey of school districts; population data generated by County Comprehensive Homeless Assistance Strategy Plans and State Department of Human Services; and SEA data on district enrollment, district socioeconomic status and statewide annual birth rates. Used population parameters generated by Urban Institute. |
| New Mexico | Two Months | Survey data from 601 of the total 648 schools in the State. |
| New York | Year | Data from New York City Board of Education's Citywide Percentage of Attendance Report; State Department of Social Services; State Division for Youth's Annual Report. |
| North Carolina | Two Days | Two-day count of homeless students residing in shelters and reports from LEAs of the numbers enrolled in school. |

Table 4

| North Dakota | Week | [illegible] service agencies in State who may deal with homeless families. Data were statistically estimated for nonresponding schools and agencies. |
|---|---|---|
| Northern Marianas | Year | Direct interviews with household members in very low-income neighborhoods, with parents/guardians living on the streets, and with homeless service providers. Other data from institutional records. |
| Ohio | Year | Data obtained from public and private schools, homeless shelters, State and regional homeless groups, domestic violence shelters, runaway shelters, children services boards, Ohio Youth Services Network. |
| Oklahoma | Year | Data from 1990 State Department of Education survey of homeless shelters. |
| Oregon | Day | One-night shelter count data annualized using a projection factor of 12, reflecting the previously determined measured turnover rate of one month. |
| Pennsylvania | Year | Statewide survey of homeless providers. |
| Puerto Rico | Year | Survey of shelter providers, local offices of Department of Social Services, and school district census. |
| Rhode Island | Year | Survey of school districts, shelters, and Traveler's Aid monthly Service Totals of runaway youth. |
| South Carolina | Year | Survey sent to school district attendance officers, Red Cross chapters, Salvation Army, county Departments of Social Services, and other service providers. |
| South Dakota | Year | Data provided by school counselors and homeless service providers. |
| Tennessee | Year | Data provided by school administrators, public and private shelters, churches, and sheriff departments. |
| Texas | Day | Yearly projection based on one-day count of homeless shelters, controlled for duplication. |

Table 4

| Utah | Year | Estimate statewide, locally based on data gathered in 1990 on homeless shelters in Utah. |
|---|---|---|
| Vermont | Year | Data collected through individual school building reports from guidance counselors or nurses; runaway programs; reports from shelters. |
| Virginia | Year | Surveys disseminated to 135 school divisions in Virginia. |
| Virgin Islands | Year | Disseminated survey to all public schools and two shelters. Obtained count via telephone interview with director of abuse center. |
| Washington | Year and Month | Annual count conducted May 30, 1990 - June 1, 1991. Monthly count conducted in May 1991 to ascertain the ratio of unsheltered homeless to the sheltered homeless. |
| West Virginia | Two Weeks | Survey of county school systems and homeless shelter agencies throughout the State. |
| Wisconsin | Year | Calendar year 1990 report based on data collected through Department of Public Instruction survey of school districts, shelters, and other homeless service agencies throughout the State. |
| Wyoming | School Year | Survey completed by all school district superintendents. County count conducted through interview process of service directors in each county. |

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UNITED STATES DEPARTMENT OF EDUCATION
WASHINGTON, D.C. 20202

AUG 1 8 1989

MEMORANDUM TO STATE HOMELESS CONTACTS

SUBJECT: Guidelines on the definition of "homeless" and developing a consistent method for counting homeless children and youth.

Enclosed are guidelines related to two major areas of concern raised during our regional meetings. Attachment A addresses what is meant by the term "homeless" child or youth; Attachment B is concerned with how the number of homeless children and youth should be counted. The guidelines reflect some of the changes that you recommended to the June 12, 1989 draft version. I appreciate the time you took to review and comment on the draft version.

Several of you requested clarification as to the legal status of guidelines. The guidelines were developed as a tool to assist you in administering the Homeless Children and Youth Program. They do not have the same binding effect as regulations; they do not impose any new legal requirement beyond those imposed by Title VII-B of the McKinney Act, the General Education Provisions Act (GEPA), and the Education Department General Administrative Regulations (EDGAR). States are not required to follow the guidelines, but may develop alternative approaches that might be more appropriate to particular local needs and circumstances. However, any alternative approaches must be consistent with the McKinney Act, GEPA, and EDGAR.

Of particular concern to some States is the recommendation that a yearly, rather than one-time, count of homeless children be made. This recommendation is intended to standardize methods used by the States in order that aggregate national totals can be obtained and to provide data that makes comparisons among the States meaningful. If you are unable to provide a yearly count, we ask that you attempt to devise a means to infer that count from the data you do collect. In making this attempt, as with other statistical manipulations, please contact the appropriate State personnel, or others who can provide expert advice in order to produce valid estimates. If a yearly count cannot be inferred, we will report data from States using one-day counts separately from data containing yearly counts.

The guidelines have been drafted in the question and answer format. Please be aware that the answers provided simply set forth general propositions that should be adopted, where possible. We recognize that in many instances, the issue of whether certain individuals should be considered homeless must be resolved on a case-by-case basis.

## QUESTIONS AND ANSWERS

QUESTION: Should children living in runaway shelters be counted as homeless, even if their parents have and are willing to provide a home for them?

ANSWER: Yes. These children meet the definition of homeless, even though their parents are not homeless.

QUESTION: Should children who have run away from home ("runaways") or children whose parent(s) or guardian(s) will not permit them to live at home ("throwaways") be counted as homeless if such children: (a) live on the streets, (b) live in abandoned buildings or other accommodations not fit for habitation, (c) live in an apartment with a group of similarly situated children without adult supervision, or (d) stay temporarily with other relatives or friends?

ANSWER: Runaway/throwaway children living on the streets as well as those living in abandoned buildings or facilities unfit for habitation should be counted as homeless. However, runaway/ throwaway children living together as a group in suitable accommodations should not, as a class, be counted as homeless. Similarly, those living temporarily with friends or relatives should not, as a class, be considered homeless. The determination of whether certain individuals in these latter classes are to be considered homeless must be made on a case-by-case basis using the definition in section 103 of the McKinney Act. Of particular significance in making this determination is the relative permanence of the living arrangements.

QUESTION: Should migratory children be considered homeless?

ANSWER: Migratory children should not, as a class, be counted as homeless merely on the basis that they are children of migratory

workers. The determination of whether certain individuals within this class are to be considered homeless must be made on a case-by-case basis using the definition of homeless in the McKinney Act. To the extent that migratory children are staying in accommodations not fit for habitation, they should be counted as homeless.

QUESTION: Should children in foster homes, especially those placed in emergency short-term foster care, be considered homeless?

ANSWER: In general, children in foster homes should not be counted as homeless. Many foster children are in the care of a public agency awaiting placement in more permanent situations. The foster home, although temporary, serves as a fixed, regular and adequate nighttime residence. Children placed in foster homes for lack of shelter space, however, should be considered homeless.

QUESTION: Should children who have been placed by the State in transitional or emergency shelters be included as homeless?

ANSWER: To determine whether these children should be considered homeless, one must first examine why they were placed in a shelter. For example, if the children were placed in an emergency shelter because there was nowhere else to send them, and they are awaiting placement in a foster home or a home for neglected children, they should be counted as homeless while in the emergency shelter. Once placed in a foster home or a home for neglected children, however, they should no longer be counted as homeless.

QUESTION: Should school-aged unwed mothers or mothers-to-be who reside in a home for unwed mothers be counted as homeless?

ANSWER: In general, if these "children" have no other available living accommodations, they should be considered homeless. However, those who are temporarily staying in a home for unwed mothers because of the need for specific services, and who will subsequently be transferring to other adequate accommodations, should not be considered homeless.

QUESTION: Should sick or abandoned children in hospitals be considered homeless if they would otherwise be released if they had a place to go?

ANSWER: Yes. There are instances where children remain in hospitals beyond the time that they would normally stay for health reasons because they have been abandoned by their families. (This situation has arisen, for example, in some instances where children are suffering from AIDS.) These children should be considered homeless because they have no other place to live. The hospital, in essence, is serving as the homeless shelter. In addition, children who were homeless prior to hospitalization should still be considered homeless while they are hospitalized unless their situation changes such that fixed, regular and adequate living accommodations would be available if they were released.

QUESTION: Should children living with their families in trailer parks and camping areas be counted as homeless?

ANSWER: These persons should be considered homeless if they are staying temporarily in parks or camping areas because they lack living accommodations that would be considered adequate under section 103 of the McKinney Act. Those living in trailer parks on a long-term basis in adequate accommodations, however, should not be considered homeless.

QUESTION: Should incarcerated children be counted as homeless?

ANSWER: Children who are incarcerated for violation or alleged violation of law should not be considered homeless even if, prior to their incarceration, they would have met the definition of homeless under section 103(a)(1) and (2) of the McKinney Act. However, children who are under care of the State and are being held in an institution simply for having no other place to live should be counted as homeless. Once these children are placed in more permanent facilities (e.g., a foster home, a home for neglected children), they should not be counted as homeless.

QUESTION: Should children of "doubled-up" families (e.g., families pooling their resources and sharing an apartment) be considered homeless?

ANSWER: Children of doubled-up families should not, as a class, be counted as homeless. Rather, the determination of whether children in this class should be considered homeless must be made on a case-by-case basis. Of particular importance in making this determination is the reasons the families have doubled up. Where one family is living with another due to loss of housing



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stemming from financial problems, for example, the children of the family that has lost housing should be considered homeless. On the other hand, children of families who are voluntarily sharing a home simply to save money generally should not be considered homeless.

QUESTION: What age groups of homeless children should be counted for purposes of Title VII-B of the McKinney Act?

ANSWER: The applicable age group is determined by State law. In general, data should be collected for those age groups entitled to a free public education in the State. Thus, if a State provides a free preschool program for children who are three to five years old, data should be collected on preschool homeless children in these age categories. Likewise, if an individual who has not completed secondary education would be entitled to a free public education up to the age of twenty in a particular State, the maximum age limit for the homeless count in that State would be twenty.

## Attachment B

### HOW SHOULD THE NUMBER OF HOMELESS CHILDREN AND YOUTH BE CALCULATED?

During the initial year of gathering data pursuant to the McKinney Act, States counted the number of homeless children in different ways. Most States provided a yearly count of the number of homeless. That is, they calculated the total number of children and youth who were homeless in their States at any time during the year. Some States, however, provided a one-day count of the number of homeless. That is, they calculated the number of children and youth who were homeless on one selected day of the year. States also varied in the degree to which they used actual counts, samples, and projections to calculate the extent of the homeless problem.

In order to obtain more meaningful data, we should attempt to minimize inconsistencies in the methods by which homeless counts are conducted. Recognizing that no method will identify precisely the actual number of homeless, we provide the following guidelines for gathering data pursuant to the McKinney Act on the number of homeless children and youth:

### GUIDELINES: HOW TO COUNT HOMELESS CHILDREN AND YOUTH

States should use the following general guidelines when calculating the number of homeless children and youth within their respective jurisdictions:

- States should adopt a yearly counting method. The particular 12-month period from which the count is obtained will be left to the discretion of each State.

- Children and youth who meet the definition of "homeless" in section 103(a) of the McKinney Act should be included in the homeless counts. To the extent feasible, the counts should take into consideration those individuals who would be classified as homeless in Attachment A.

- In calculating the yearly total of homeless children and youth, States may use actual counts or estimates based on samples and projections. In other words, States need not count every homeless child or youth specifically; a sampling technique may be used to estimate the number of homeless. States may project a yearly homeless count from a number of one-day counts.

- The counting methodologies should contain procedures to eliminate duplicative counts. The total homeless count should reflect the number of children and youth who were homeless at any given time during the 12-month period examined. To the extent possible, an individual should not be included in the homeless population count more than once. For example, if an individual became homeless more than one time during the year, he/she should be included in the count only once. Likewise, if an individual moves from one homeless shelter to another, he/she should be counted only once. Sampling techniques used to estimate the number of homeless should contain provisions that account for recidivism, transfers between shelters, and other potential sources of duplicative counting.

- Some categories of homeless children and youth may be difficult, if not impossible, to count because the individuals refused to be identified. Chief among this group are children living in "doubled-up" families. If you are unable to provide a reasonable estimate of the children, you should so indicate on your data collection form.

Statement of Work

I. Objectives

The Census Bureau will design a federal survey on homeless persons that will estimate the total national homeless population. The Census Bureau will consult with participating Federal agencies and relevant outside researchers in developing the survey design. The definition of who is to be included as "homeless" will be provided by the participating agencies. If funding is available, a pretest will be conducted in 1993 and the survey in 1994. The survey will be designed to provide data comparable to the 1987 Urban Institute survey on homeless persons in cities of 100,000 or more. The survey will collect characteristics of homeless persons, which will include specific subgroups such as children and veterans. Counts of those in rural areas who use food pantries could be provided although the ranges will be relatively large. The characteristics of homeless persons in rural areas will be identified separately only if funding is sufficient to significantly increase the sample size in rural areas. Otherwise, the focus will remain national. The Census Bureau will work closely with the agencies sponsoring the survey concerning their data requirements. The survey will enumerate persons at service points (for example, shelters and soup kitchens). Most of the work will be done through Joint Statistical Agreements between the Bureau of the Census and other experts in enumerating the homeless population. The Census Bureau will have responsibility for ensuring that work is completed in a timely manner and addresses the needs of the sponsoring agencies.

II. Tasks to be Completed

The study design will cover sample design, including appropriate statistical statements about the data to be collected, and operational components such as questionnaire development, plans for interviewer training and procedures, data processing and estimator procedures.

A. Sample Design

For the sample design, we will (1) select sample areas, called "Primary Sampling Units" or PSUs: (2) identify sources of "frames" (lists of shelters, soup kitchens, food pantries) for all the related PSUs: (3) obtain the lists of shelters, etc. for the pretest areas, and (4) select the sample of shelters. Our proposed design has 52 PSUs which will be large cities or populous counties over 100,000 in population. We propose 12 PSUs to represent the remainder of the country. Although we have been calling this the "rural" part of the sample,

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nonmetropolitan urban areas, that is, medium and small towns.

We also will make detailed cost estimates and, based on these, decide how many shelters to visit, how often to contact them, and how long to run the survey. As part of this, we will have discussions about the sample design with others who have conducted homeless surveys.

B. Estimator Procedures

We will correct for duplication by collecting information from the respondents about what other services they have used, and make weighted adjustments for multiple chances of selection.

C. Operational Components

A questionnaire will be designed that will collect the specific information requested by the various agencies. The questionnaire will undergo extensive review by Census Bureau staff and the appropriate Federal agencies.

Plans for interviewer training packages and procedures will be developed to ensure that Census Bureau current survey interviewers receive specialized training to enumerate this population group.

The Census Bureau will determine what exemptions need to be requested to pay homeless respondents to participate in the survey.

III. Deliverables

As soon as the data are complete, it will be provided to the Department of Veterans Administration and the other agencies contributing to this research project. For any formal distribution of the research results, all agencies contributing to the project will be acknowledged for their participation in the design and funding of the work.

UNITED STATES DEPARTMENT OF EDUCATION
WASHINGTON, D.C. 20202-6132

MAY 6 1991

MEMORANDUM TO STATE COORDINATORS FOR EDUCATION OF HOMELESS CHILDREN AND YOUTH

SUBJECT: Questions and Answers on the Stewart B. McKinney Homeless Assistance Act

At our meeting on March 25 and 26, you asked that several questions you had on the McKinney Act requirements, and the Department's interpretation of them, be distributed to you. Attached are the questions you raised--both at our meeting and those previously submitted by Peggy Jackson-Jobe--and our responses to them.

Mary Jean LeTendre
Director
Compensatory, Education Programs

Attachment

Q.1 What standards must a State educational agency (SEA) meet as it revises its State plan? Is there a suggested format?

A. There is no suggested format for the State plan. To be acceptable, the plan must explain how the State will address each requirement in Section 722(e) of the Act. You need not include those items already addressed in the original plan--only the new items included in the 1990 amendments.

Q.2 Does the initial submission of an application meet the deadline even if the State plan requires revision?

A. No. Applications must be submitted in approvable form by August 30, 1991. However, we urge you to submit applications by May 30 in order to receive awards in July, and to leave sufficient time for any revisions that may be needed.

Q.3 Can a homeless student who is receiving direct services continue receiving the services once the family is permanently housed?

A. Children who are eligible for a service because of homelessness may continue to receive the service until the period of time for which the service was to be provided is over. For instance, a homeless child attending an after-school program who moves into a permanent residence may remain in the after-school program for that school year. However, there is no requirement that the service be continued. Local and State agencies may decide, on a case-by-case basis, when to continue services and when it may be preferable to replace this child with another one who has become homeless.

Q.4 What is the meaning of Section 722(e)(1)(E) of the Act?

A. This section requires that homeless children be afforded the same access to before- and after-school programs as are available to children with established residences. The progress report accompanying your 1992 application must address the data requirement in Section 722(e)(1)(E).

Q.5 By what date can States expect their grant awards for the fifth-year funding?

A. Fifth-year awards will be made in early July 1991 for States that submit applications by May 30, 1991. Applications submitted during June, July, and August will be processed as received. All awards will be made by September 30, 1991.



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UNITED STATES DEPARTMENT OF EDUCATION
WASHINGTON, D.C. 20202-6132

JUL 16 1991

MEMORANDUM TO STATE COORDINATORS FOR EDUCATION OF HOMELESS CHILDREN AND YOUTH

SUBJECT: Additional Questions and Answers on the Stewart B. McKinney Homeless Assistance Act

On May 6, a memorandum containing Questions and Answers on the Stewart B. McKinney Homeless Assistance Act was forwarded to you in response to questions regarding the McKinney Act requirements. Enclosed are two additional Questions and Answers based on questions raised since my last memorandum.

Mary Jean LeTendre
Director
Compensatory Education Programs

Enclosure

Q.6 By what date can States expect to receive additional appropriated funds that were not applied for by eligible SEAs?

A. We anticipate that any reallocated funds will be made available to States by September 30, 1991.

Q.7 Will the U.S. Department of Education (ED) provide guidance to State coordinators regarding the process for obtaining counts on the number of homeless children and youth (Section 724(b)(2)(A))?

A. The guidance on counting homeless children that was developed with State coordinators and distributed on August 18, 1990, should be used in conducting the count for 1991. A copy of the guidance is attached. States are only required to provide to ED reports on their counts every two years--the next report being due on December 31, 1991. States that completed counts during calendar year 1990 may submit this data to meet the December 31, 1991, reporting deadline. Please indicate the calendar year (i.e., 1990 or 1991) during which the data were collected.

Q.8 To what extent must a local educational agency (LEA) provide transportation to and from school for homeless children?

A. As a general rule, Section 722(e)(5) of the Act requires that homeless children be provided transportation services that are "comparable" to the services offered to other students in the school selected. For instance, if, in the school selected, children who reside 1-1/2 miles away are provided transportation to and from the schools, transportation should be provided to all homeless children whose temporary residence exceeds the 1-1/2 mile limit.

In some instances, however, even if "comparable" services are provided, lack of adequate transportation may still act as a barrier to school attendance by homeless children. Many neighborhood schools, for instance, may offer no transportation services at all. Homeless children who attend that school and are temporarily housed some distance from it would find lack of transportation a barrier to attendance. Section 722(e)(1)(B) of the Act requires that State plans to address how States will overcome these barriers. In addition, the "Statement of Policy" in Section 721 by the Act requires that States review and undertake to eliminate transportation barriers. Finally, an LEA that receives funds under the Act may use funds authorized for "related activities" to defray the excess cost of transportation not otherwise provided through Federal, State, or local funding. See Section 723(b)(2)(D).

QUESTION

May LEAs use Title VII-B funds to provide services to children and youth who are not homeless?

ANSWER

In limited instances, Title VII-B funds may be used to serve non-homeless children and youth in addition to homeless children and youth. See Section 723(a)(2) of the McKinney Act. Specifically, non-homeless children and youth may receive services under Title VII-B if (1) the services are provided through programs on school grounds, (2) the non-homeless students are at risk of failing in or dropping out of school, and (3) the program is able to accommodate the non-homeless students after giving priority for the services to homeless children and youth.

The determination of whether non-homeless children may participate in a program funded under Title VII-B must be made on a case-by-case basis. There is no specific limitation on the number or percentage of non-homeless children who may participate in a local educational agency's (LEA) homeless program. However, the Act provides that grants are made to LEAs "for the purpose of facilitating the enrollment, attendance and success of homeless children and youths in schools" (emphasis added). See Section 722(a)(1). As stated above, the statute also requires that "priority for . . . services shall be given to homeless children and youths" (emphasis added). See Section 723(a)(2). As the number or percentage of non-homeless students served by Title VII-B funds increases, it becomes more questionable whether the LEA is expending those funds in accordance with the requirements of the McKinney Act.

QUESTION

How are State educational agencies (SEAs) to award Title VII-B funds to LEAs and other entities?

ANSWER

The award of Title VII-B funds to an LEA must be by grant, rather than contract. The Act provides that a State will use funds not otherwise reserved for State activities "to award grants to local educational agencies in accordance with subsection (c)(6)" (emphasis added). See Section 722(g)(3). (A State may reserve for State activities in any fiscal year no more than the greater of (1) 5 percent of the amount received in that fiscal year or (2) the amount the State receives for State activities in fiscal year 1990.)

The award of Title VII-B funds to other entities (i.e., entities that are not LEAs) must be by contract, rather than grant. Under the McKinney Act, SEAs are authorized to "provide activities for and services to homeless children and homeless youths that enable such children to enroll in, attend, and achieve success in school." See Section 722(c)(2). Thus, SEAs are now authorized to provide direct services to homeless children and youth and may contract with other entities to provide these services. Because the authorizing statute (i.e., the McKinney Act) does not specifically authorize the awarding of grants to non-LEAs, any funds awarded to these other entities must be by contract and not by grant. See 34 C.F.R. §76.50(b).

# OUTLINE OF SIGNIFICANT ASPECTS OF TITLE VII-B OF THE STEWART B. MCKINNEY HOMELESS ASSISTANCE ACT

## I. Reauthorization

- Act reauthorized on November 29, 1990.
- Reauthorizing statute -- Stewart B. McKinney Homeless Assistance Amendments Act of 1990 (P.L. 101-645).
- Amounts authorized to be appropriated -- $50,000,000 for FY 1991, and "such sums as may be necessary" for FYs 1992 and 1993.
- Authorized amounts v. appropriated amounts.

## II. Significant Changes Under the New Act

- Requirement for review and revision of laws, regulations, practices, or policies that may act as barriers to the enrollment, attendance, or success in school of homeless children and youth.
- Authorization of direct services by SEAs under Sec. 722(c).
- Programs for school personnel to heighten awareness of problems of educating homeless children and youth.
- Revisions to State plans required under Sec. 722(e).
- Change in SEA reporting requirements.
  (a) Once every two years, a report on number and location of homeless children and youth, the number enrolled in schools, problems they face, State's progress in addressing problems. (Sec. 722(d)).
  (b) Data in State plan on number of homeless served and description of success of program. (Sec. 723(e)).

• Grants to LEAs to facilitate enrollment, attendance and success of homeless children and youth in schools. Mandatory v. discretionary awards to LEAs.

• Elimination of exemplary grant program competition.

• Substantial change in amounts authorized for program.

## III. Section 722 Program Application

(A) Eligible applicants

SEAs in the 50 States, the District of Columbia, Puerto Rico, the Virgin Islands, Guam, American Samoa, the Commonwealth of the Northern Mariana Islands, and Palau. Memorandum of understanding with BIA for programs for Indian students served by schools funded by the Secretary of the Interior.

(B) Allocation of appropriated funds

• Up to $250,000 to the Department to conduct a study to determine the best means of identifying, locating and counting homeless children and youth.

• Up to 0.1 percent of the appropriated amount to be allocated among the Virgin Islands, Guam, American Samoa, Northern Mariana Islands and Palau. Hold harmless provision for these territories for FY 1991.

• Up to 1 percent for programs for Indian students served by schools funded by the Secretary of the Interior.

• Remaining amount allocated among participating States based on proportion that each State's Chapter 1 grant is to total Chapter 1 basic grant funds.

• Allocation tables.

(C) SEA application process

• FY 1991 applications sent out to SEAs.

• Application deadline -- Department requests application by May 31, 1991. Any application received after August 30, 1991 will not be processed. (Sec. 724(b)(6)).

- Funds to be awarded on a rolling basis.

- Applicants must submit revised State plan addressing requirements of Section 722(e).

## IV. SEA Responsibilities

- Carry out policies in Section 721 -- assure access to free, appropriate, public education; review and undertake steps to eliminate laws, regulations, practices or policies that act as barriers; not separate students from mainstream environment solely on basis of homelessness.

- Provide activities for and services to homeless children and youth to enable them to enroll in, attend and achieve success in school.

- Establish or designate an Office of Coordinator that will --
  (1) Gather data every two years.
  (2) Develop and carry out State plan.
  (3) Submit report on December 31, 1991, and every two years thereafter.
  (4) Facilitate coordination among various agencies providing services to the homeless.
  (5) Develop relationships and coordinate with other relevant programs and providers.

- Develop and implement programs for school personnel to heighten awareness of problems of homeless children and youth.

- Award grants to LEAs -- mandatory if SEA receives more funds than it received in FY 1990; otherwise, SEA has discretion to award grants to LEAs.

## V. State Plan Requirements

- Authorize SEA, LEA, parent or guardian, or social worker to make determinations.

- Procedures for prompt resolution of disputes concerning placement.

- Programs for school personnel to heighten awareness.

• Ensure that those who are eligible are able to participate in food programs.

• Ensure that those who are eligible are able to participate in before- and after-school care programs; in subsequent plans, provide for disclosure of data concerning participation.

• Address problems set forth in report to Secretary.

• Address problems regarding education of homeless children and youth, including problems caused by transportation issues, and enrollment delays caused by immunization requirements, residency requirements, lack of records and guardianship issues.

• Demonstrate that SEAs and LEAs have developed policies to eliminate barriers to enrollment and retention in school of homeless children and youth.

• Ensure that SEAs and LEAs will adopt policies to ensure that homeless are not isolated or stigmatized.

• Procedures for placement of homeless children and youth, giving consideration to child's or youth's best interest.

• Comparability of services issues, including transportation services, educational services, and school meal programs.

• Maintenance and availability of records issues.

• LEA coordination with local service agencies and other agencies providing services to the homeless.

• For LEAs receiving assistance, LEA designation of homeless liaison to ensure that homeless children and youth enroll in and succeed in school, and that homeless families, children and youth receive the services for which they are eligible. State coordinators and LEA liaisons shall inform school personnel, service providers and advocates of the duties of the liaisons.

• SEAs and LEAs to review and revise policies that act as barriers to enrollment, giving consideration to issues concerning transportation, immunization requirements, residency, birth certificates, school records or other documentation, and guardianship. Special attention to be given to ensuring enrollment and attendance of those not currently attending school.

## VI. LEA Application Process

(A) Mandatory v. discretionary awards to LEAs

- If, for a given fiscal year, a State receives more than it received for FY 1990, it must make awards to LEAs. (Section 722(c)(6)).

- When the award of subgrants is mandatory, State may retain for SEA purposes the greater of 5 percent of the SEA grant amount or the amount the SEA received for State activities for FY 1990. Because of funding level, SEA may reserve for State activities up to that amount received for FY 1990. Remainder must be awarded to LEAs. (Section 722(g)).

- If a State does not receive more than it received for FY 1990, it may, but is not required to, provide grants to LEAs. (Section 722(c)(6)).

- Awards to LEAs must be on the basis on need. However, if appropriation to Department equals or exceeds $100,000,000 (which it does not), awards to LEAs relate to Chapter 1 formula. (Section 722(g)).

(B) Factors that may be considered in determining need

- Number of homeless children and youth enrolled in preschool, elementary and secondary schools, needs of such children, and ability of agency to meet these needs.

- Extent to which proposed use of funds would facilitate enrollment, retention and educational success.

- Coordination with other local and State agencies that serve homeless, as well as the State plan.

- Commitment to education of all homeless children and youth, reflected in application and in current practice.

- Other criteria the SEA deems appropriate.

(C) Minimum LEA application requirements

- Description of services and programs for which assistance is sought and problems sought to be addressed.

• Assurances that LEA complies with or will use requested funds to come into compliance with State plan requirements in paragraphs (3) through (9) of Section 722(e).

• Assurance that assistance will supplement, and not supplant, other funds used to provide services to homeless children and youth.

• Description of policies and procedures that LEA will implement to ensure LEA activities will not isolate or stigmatize homeless children and youth.

• Other information as may be reasonably required by the SEA.

## VII. LEA Authorized Activities

(A) General Provisions

• Services on school grounds or at other nonsectarian facilities.

• When services are on school grounds, they may be available to children at risk of failing in or dropping out of school. However, priority must be given to homeless children and youth.

• To the extent practicable, services must be provided through existing programs and mechanisms that integrate homeless and nonhomeless individuals.

(B) Primary Activities

• At least 50 percent of the funds provided to an LEA must be used to provide tutoring, remedial education services, or other education services to homeless children and youth.

(C) Related Activities

• At least 35 percent, but not more than 50 percent, of the funds provided to LEA may be used for activities that may include --

- Expedited evaluations of the strengths and needs of homeless children and youth.

- Professional development for school personnel to develop awareness and heighten sensitivity to needs and rights of homeless children and youth.

- Referral services for medical, dental, mental and other health services.

- Assistance to defray excess cost of transportation not otherwise provided through other funding.

- Developmentally appropriate early childhood programs for preschool age children.

- Before- and after-school and summer programs with qualified personnel.

- Where necessary, payment of fees and costs associated with tracking, obtaining and transferring records.

- Parent education and training of parents about rights and resources available to their children.

- Coordination between school and agencies providing services to the homeless.

- Counseling, social work and psychological services.

- Activities to address particular needs of homeless children and youth that may arise from domestic violence.

- Programs for school personnel to heighten awareness of specific educational needs of runaway and homeless youth.

- Adaptation of space and purchase of supplies for nonschool facilities made available to provide services.

- School supplies at the shelter or temporary housing facilities.

**CAVEAT:** This outline has been prepared to assist you in understanding the changes to and requirements of Title VII-B of the Stewart B. McKinney Homeless Assistant Act. It does not supersede or serve as a substitute for any of the statutory provisions.